

SIMON GREENSTONE PANATIER, PC
1201 Elm Street, Suite 3400
Dallas, TX 75270
Tel: (214) 276-7680
Leah C. Kagan (NJ ID No. 013602009)
lkagan@sgptrial.com

Counsel for Various Mesothelioma Talc Claimants

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

LTL MANAGEMENT LLC,

Debtor.

Chapter 11

Case No. 23-12825 (MBK)

Judge: Michael B. Kaplan

**MESOTHELIOMA CLAIMANTS' JOINDER TO KAZAN LAW CLAIMANTS'
OPPOSITION TO DEBTOR'S MOTION FOR AN ORDER: (1) AUTHORIZING IT TO
FILE A LIST OF THE TOP LAW FIRMS WITH TALC CLAIMS AGAINST THE
DEBTOR IN LIEU OF THE LIST OF THE 20 LARGEST UNSECURED CREDITORS;
(2) APPROVING CERTAIN NOTICE PROCEDURES FOR TALC CLAIMANTS; AND
(3) APPROVING THE FORM AND MANNER OF
NOTICE OF COMMENCEMENT OF THIS CASE**

The below law firm signatories herein (jointly "Mesothelioma Claimants Counsel"),¹ on behalf of their various talc mesothelioma claimants ("Mesothelioma Claimants") through their undersigned counsel, hereby submit this joinder objection to the objection filed by Kazan Law on behalf of its Claimants ("Kazan Claimants Objection"), objecting to the motion of Debtor LTL Management LLC ("Debtor") for an Order Authorizing Debtor to File a List of the Top Law Firms With Talc Claims Against the Debtor in Lieu of the List of the 20 Largest Unsecured Creditors [Dkt. 73.], which is incorporated herein by reference. For the reasons cited in the Kazan Claimants

¹ The Mesothelioma Claimants Counsel collectively represent over a thousand Mesothelioma Claimants, both filed and unfiled.

Objection, the Mesothelioma Claimants respectfully request that this Court deny Debtor's motion authorizing it to file a list of "Top Law Firms" and instead order Debtor to submit a list pursuant to Rule 1007(d), and for such other relief as to which Mesothelioma Claimants may be entitled.

The Mesothelioma Claimants further object to Debtor's assertion that "the proposed plan of reorganization agreed to by thousands of claimants" being "in the best interest of all parties." [Debtor's Statement Regarding Refiling of Chapter 11 Case. Dkt. 3 at 9.] There is no support provided for the assertion that 60,000 "claimants" have supported the Debtor's proposed plan.² Moreover, the Mesothelioma Claimants were not involved in, do not support, and assert it is not in their best interest to extinguish their 7th Amendment rights to a trial by jury.³ The Mesothelioma Claimants reserve their rights to modify or supplement this Joinder as necessary and appropriate.

Dated: April 10, 2023

SIMON GREENSTONE PANATIER, P.C.

/s/ Leah C. Kagan
Leah C. Kagan (NJ ID No. 013602009)
1201 Elm Street, Suite 3400
Dallas, TX 75270
lkagan@sgptrial.com

-and-

WATERS, KRAUS & PAUL

/s/ Charles Siegel
Charles Siegel
3141 Hood Street, Suite 200
Dallas, TX 75219
siegel@waterskraus.com

² Debtor's Statement Regarding Refiling of Chapter 11 Case. [Dkt. 3 at 2.]

³ Furthermore, the jurisdictional question of good faith is independent of, and precludes consideration of, the Debtor's claim that its proposed plan is in the best interests of the creditors. In re SGL Carbon Corp., 200 F.3d 154, 159 & n. 8 (3rd Cir. 1999).

-and-

FROST LAW FIRM, P.C.

/s/ Scott L. Frost
Scott L. Frost
273 West 7th Street
San Pedro, CA 90731
scott@frostlawfirm.com

-and-

COHEN, PLACITELLA & ROTH

/s/ Christopher M. Placitella
Christopher M. Placitella
127 Maple Avenue
Red Bank, NJ 07701
cplacitella@cprlaw.com

-and-

BELLUCK & FOX, LLP

/s/ Joseph Belluck
Joseph Belluck
546 5th Avenue, 5th Floor
New York, NY 10036
jbelluck@belluckfox.com

-and-

**MAUNE RAICHLE HARTLEY
FRENCH & MUDD, LLC**

/s/ Clayton L. Thompson
Clayton L. Thompson
150 W. 30th Street, Suite 201
New York, NY 10001
cthompson@mrhfmllaw.com

-and-

NEMEROFF LAW FIRM

/s/ Rick Nemeroff
Rick Nemeroff
5532 Lillehammer Lane, Suite 100
Park City, UT 84098
ricknemeroff@nemerofflaw.com

-and-

DEAN OMAR BRANHAM & SHIRLEY, LLP

/s/ Jessica Dean
Jessica Dean
302 N. Market Street, Suite 300
Dallas, TX 75202
jdean@dobslegal.com

-and-

SERLING & ABRAMSON, P.C.

/s/ Eric Abramson
Eric Abramson
280 N. Old Woodward Ave., Suite 406
Birmingham, Michigan 48009
eabramson@serlinglaw.com

-and-

THE RUCKDESCHEL LAW FIRM, LLC

/s/ Jonathan Ruckdeschel
Jonathan Ruckdeschel
8357 Main Street

Ellicott City, Maryland 21043
ruck@rucklawfirm.com

-and-

LIPSITZ, PONTERIO & COMERFORD, LLC

/s/ John P. Comerford

John P. Comerford
424 Main Street, Suite 1500
Buffalo, NY 14202
jpc@lipsitzponterio.com

-and-

**THE LAW OFFICES OF WORTHINGTON &
CARON, P.C.**

/s/ John M. Caron

John M. Caron
273 W. 7th Street
San Pedro, CA 90731
john@worthington-caron.com

-and-

SATTERLEY & KELLEY, PLLC

/s/ Paul J. Kelley

Paul J. Kelley
8700 Westport Road, Suite 202
Louisville, KY 40242
pkelley@satterleylaw.com

-and-

REBECCA S. VINOCUR, P.A.

/s/ Rebecca S. Vinocur, P.A.
Rebecca S. Vinocur
5915 Ponce De Leon Blvd., Suite 14
Coral Gables, FL 33146
rvinocur@rsv-law.com

-and-

NASS CANCELLIERE

/s/ Casey Ryan Coburn
Casey Ryan Coburn
1500 JFK Blvd., Suite 404
Philadelphia, PA 19102
ccoburn@nasscancelliere.com

-and-

**ROGERS, PATRICK, WESTBROOK &
BRICKMAN, LLC**

/s/ J. David Butler
J. David Butler
Post Office Box 3088
Aiken, SC 29802
dbutler@rpwb.com

-and-

THE HOFFMAN LAW FIRM

/s/ Shepard A. Hoffman
Shepard A. Hoffman
8226 Douglas Avenue, Suite 740
Dallas, TX 75225
shoffman@shephoffman.com

-and-

**EARLY LUCARELLI SWEENEY AND
MEISENKOTHEND, LLC**

/s/ Ethan Early
Ethan Early
360 Lexington Ave., 20th Floor
New York, NY 10017
eearly@elslaw.com

-and-

THORNTON LAW FIRM, LLP

/s/ Andrea Marino Landry
Andrea Marino Landry
One Lincoln Street, 13th Floor
State Street Financial Center
Boston, MA 02111
alandry@tenlaw.com

-and-

GOLDBERG PERSKEY & WHITE, P.C.

/s/ Bruce Mattock
Bruce Mattock
11 Stanwix St., Suite 1800
Pittsburgh, PA 15222
bmattock@gpwlaw.com

-and-

SIMMONS HANLY CONROY, LLC

/s/ Christopher Guinn
Christopher Guinn
One Court Street

Alton, IL 62002
cguinn@simmonsfirm.com

-and-

BERGMAN DRAPER OSLUND UDO, PLLC

/s/ Brendan Little
Brendan Little
821 2nd Avenue, Suite 2100
Seattle, WA 98104
brendan@bergmanlegal.com

-and-

KARST & VON OISTE, LLP

/s/ Eric Karst
Eric Karst
505 Main Street
Port Jefferson, NY 11777
epk@karstvonoste.com

-and-

MEIROWITZ & WASSERBERG, LLP

/s/ Daniel Wasserberg
Daniel Wasserberg
1040 Sixth Avenue, Suite 12B
New York, NY 10018
dwasserberg@mwinjurylaw.com

-and-

MOTLEY RICE, LLC

/s/ Nathan D. Finch
Nathan D. Finch
401 9th Street NW, Suite 630
Washington DC 20004
nfinch@motleyrice.com

-and-

MICHIE HAMLETT, PLLC

/s/ Greg Webb
Greg Webb
310 4th Street NE
PO Box 298
Charlottesville, VA 22902
gwebb@michiehamlett.com